

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS**

**Criminal Number  
No. 05-10059-DPW**

**UNITED STATES OF AMERICA**

**VS.**

**CHAD BENJAMIN**

**DEFENDANT'S MOTION FOR EXTENSION OF TIME FOR  
FILING OF BRIEF**

Now comes the defendant, Chad Benjamin, in the above numbered indictment, through counsel, and moves this Honorable Court for an order extending the time for the filing of his brief to July 26, 2006.

In support of the within motion counsel for the defendant says that he has been on trial literally every day since May 4, 2006 when he began the multiple gang rape trial in New Bedford Superior Court of Commonwealth vs. David Kimble, et. al. Upon completion of the Kimble trial which took two weeks to reach jury verdict counsel began the first degree murder trial of Commonwealth vs. Ablode Ahiahornu in Suffolk Superior Court on May 17<sup>th</sup>. This trial concluded on June 17<sup>th</sup> resulting in a hung jury.

Counsel is presently on trial in Barnstable Superior Court regarding the matter of Commonwealth vs. Jared Bickford and will be leaving for vacation from July 8<sup>th</sup> through July 23<sup>rd</sup>.

WHEREFORE the defendant respectfully requests that this Court extend to July 26, 2006 the deadline for the filing of the defendant's brief.

Counsel agrees to exclude this time under the Speedy Trial Act.

Chad Benjamin,  
By his attorney

/s/Kevin J. Reddington